

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi ☐

Southern__ Division

Catina Washington

Case No. 1:23cv370 HSO-BWR

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

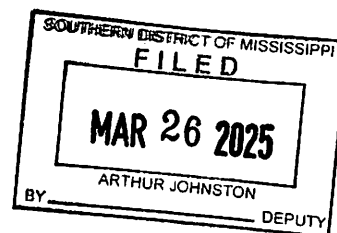
-v-

Laura Hostetter

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No



AMENDED COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Catina Washington
Street Address	P.O.Box 1455
City and County	Lucedale, George
State and Zip Code	39452
Telephone Number	228-217-1971
E-mail Address	catinwash@icloud.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name

Laura Hostetter

Job or Title (if known)

Disciplinary Hearing Officer

Street Address

22689 MS-63

City and County

Leakesville, Greene

State and Zip Code

MS 39452

Telephone Number

601-359-5600

E-mail Address (if known)

Defendant No. 2

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 3

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 4

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1983, 1985, usc 241, MS STATE CONST. 1980, 18 USC 1512, 5 USC 2302, UNITED STATES CONSTITUTION

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Catina Washington, is a citizen of the State of (name) Mississippi.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____ and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Laura Hostetter, is a citizen of the State of (name) Mississippi. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____ and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Plaintiff suffered miscarriage of justice, humiliation, anxiety, fear, retaliation, conspiracy, and was viciously attacked by a prisoner under MDOC and parties engaged in cover-up, failure to prosecute, deprivations of state/federal rights. In summary, plaintiff had to undergo serious surgery from the attack. The parties collectively violated their Oath of Office in upholding the United States Constitution, and acted as gatekeepers in obstructing the pursuit of justice.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I, Catina Washington assert that on or about the month of December of 2020, while employed as case manager at South MS Corr. Facility that a prisoner viciously attacked me and I suffered severe injuries which resulted in surgery. Upon information & belief, Plaintiff states that she was deprived of the right to be heard once she blew the whistle and filed grievances with the entire chain of command at MDOC, CID, MBI, District Attorney's Office, Sheriff's Dept. of Greene County, and additional attorneys but to no avail was plaintiff afforded protections as a victim regarding the right to prosecute. Additionally, all parties are fully aware of the situation but failed to follow the letter of the law stemming from dates of 12/2020 till 2023 and all alleged investigations were not properly done. Plaintiff believes such acts constitute a cover-up on behalf of all parties collectively.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff seeks punitive damages \$3,000,000 to punish defendants for causing irreparable harm.
Plaintiff seeks \$100,000 individually from all defendants for engaging in cover-up & failure to safeguard rights and for acting as gatekeepers in preventing charges being executed.
Plaintiff seeks \$200,000 individually & officially for defendant *Laura Hostetter*

Plaintiff continues to suffer from being deprived of her Constitutional Rights as a whistle blower and faced with so

Plaintiff seeks a jury trial pursuant to Federal Rules of Civil Procedure.
Plaintiff seeks full disclosure of any/all records regarding the assault.
Plaintiff seeks digital copy of any/all surveillance footage of the attack.
Plaintiff seeks any relief deemed fit by this Honorable Court.


V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3-26-25

Signature of Plaintiff 
Printed Name of Plaintiff Catina Washington

B. For Attorneys

Date of signing: _____

Signature of Attorney _____
Printed Name of Attorney _____
Bar Number _____
Name of Law Firm _____
Street Address _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____